

AFFIDAVIT

I, Alan M. Book, a Postal Inspector with the United States Postal Inspection Service (USPIS), being duly sworn, depose and state:

INTRODUCTION

1. I am a Postal Inspector with the United States Postal Inspection Service, in Tucson, AZ, and have been employed as such since September of 2016. Since December 2016, I have been stationed at the Tucson, Arizona office of the Phoenix Division. I attended the twelve-week training course at the United States Postal Inspection Service Academy in Potomac, MD. There I received training related to violations of federal law including assaults, robberies, and criminal investigations of narcotics trafficking via the United States Mail. Prior to becoming a Postal Inspector, I was employed as a United States Border Patrol Agent for approximately 5 years. Throughout my law enforcement career, I have had extensive training and experience investigating a variety of criminal violations including controlled substances. On September 15, 2017 I successfully completed a 40 hour training course on Prohibited Mailings and Narcotics. On September 15, 2017, I also completed the Narcotics Identification Competency Level Course.

2. I am currently working with Inspector Ethan A. Paszko, who has conducted hundreds of criminal investigations throughout his career and who, since 2012, has conducted over one hundred investigations involving the mailing of narcotics and/or the money derived from the sale of narcotics. Inspector Paszko has obtained in excess of one hundred federal search warrants for United States Mail parcels and letters. Postal Inspectors in Tucson routinely work with each other to identify and interdict suspected narcotics parcels.

DESCRIPTION OF SUBJECT PARCEL

3. This affidavit is made in support of an application for a search warrant for a United States Priority Mail parcel in connection to mailing narcotics proceeds. The Subject Parcel is described as:

SP: USPS Priority Mail parcel with USPS Tracking Number 9505 5107 6486 2230 1283 09, bearing \$16.10 in postage, postmarked from Concord, VA 24538 on August 18, 2022. It bears a return address of "Briana Niebla, 2710 W Paulus Rd, Tucson, AZ 85746" and is addressed to "Carlos Valenzuela, 2772 W Bird Rd, Tucson, AZ 85746." The parcel consists of a white Priority Mail parcel, weighing approximately 2 pound, 3 ounces and measuring approximately 11" X 8 ½" X 5 ½."

The white Priority Mail parcel is hereinafter referred to as "SUBJECT PARCEL."

**BACKGROUND ON USPS DRUG INTERDICTION IN SOUTHERN ARIZONA AND THE USPS
DRUG MAIL PROFILING PROGRAM**

4. Based upon my training, personal experience, and the collective experiences relayed to me by other Postal Inspectors who specialize in investigations relating to the mailing of controlled substances and the proceeds from sales of controlled substances, I am aware that the Southern Arizona international border is a leading area of the United States for the entry of controlled substances from Mexico. Based on the large quantities of controlled substances entering Southern Arizona, controlled substances are frequently transported from Southern Arizona via the United States Mail to metropolitan areas across the United States, primarily to the eastern United States and Puerto Rico. It is also common for the proceeds from the sale of the controlled substances to be sent to Southern Arizona via the United States Mail. By using the U.S. Mail to ship controlled substances, drug traffickers place a significant risk on unknowing postal employees who handle and deliver those mailings.

5. Based on the frequent use of the United States Mail for the shipment of controlled substances from Southern Arizona, Postal Inspectors in Tucson routinely profile inbound and outbound mail articles for suspicious characteristics common to drug parcels and proceeds. While there are many characteristics that experienced inspectors look for, the most common characteristics found are:

- a. Suspected proceeds parcels are mailed from known drug destination areas, primarily the large metropolitan areas in the eastern half of the United States, Alaska, and Puerto Rico.
- b. The sender names and addresses on drug proceeds parcels routinely contain fictitious names, misspellings, or incomplete, inaccurate, and/or unauthorized information.
- c. A tracking number is used to provide the trafficker the ability to track the parcel's progress to the point of delivery.
- d. The postage was paid with cash which leaves no trail identifying the sender.

Parcels found to meet all of the suspicious characteristics described in subsections a through d of this paragraph are further investigated by Postal Inspectors.

INVESTIGATIVE DETAILS

6. Postal Inspectors routinely profile inbound and outbound mail articles for suspicious characteristics common to drug parcels and proceeds. On August 22, 2022, during drug and proceeds interdiction activities in Tucson, Arizona, Postal Inspectors observed the Subject Parcel at the USPS Tucson Processing and Distribution Center.
7. The SUBJECT PARCEL revealed the following characteristics of proceeds parcels:
 - a. I reviewed records from “CLEAR-Thompson Reuters” (an on-line data base program used by law enforcement for address verifications, business searches and person searches) and USPS address records to check for records of the sender and addressee name and address on the SUBJECT PARCEL. Records checks on the return address listed on the parcel revealed that “Briana Niebla” does not live at the address listed on the parcel. Postal records also revealed that “Carlos Valenzuela” does not live at the address listed on the parcel.
 - b. The SUBJECT PARCEL bears a tracking number. In my experience nearly all drug parcels and drug proceeds have tracking numbers allowing the sender to routinely check to follow the progress of the parcel to its destination.
 - c. The parcel was mailed from Virginia, which is an area I know based on training and experience to be a destination area for drug parcels and a source area for proceeds from the sale of those drugs.
 - d. The postage for the SUBJECT PARCEL was paid for in cash. Paying cash gives the mailer anonymity that paying with a check, or a credit/ debit card would not.

CANINE EXAMINATION PERFORMED WITH POSITIVE RESULTS

8. On August 22, 2022, at approximately 1:30 p.m., I met with Officer Gabe Tapia of the Marana Police Department and his narcotics canine partner Iris. Officer Tapia’s canine is trained and certified to detect the odors of heroin, cocaine, and methamphetamine. I placed the SUBJECT PARCEL in a cleared area for examination by Officer Tapia and Iris. Officer Tapia informed me at 1:50 p.m. that Iris had positively alerted to the SUBJECT PARCEL, indicating the presence of narcotics or a controlled substance, or other evidence with an odor of narcotics or a controlled substance within the parcel.

9. Based on the facts set forth in this affidavit, I believe there is probable cause to show that the SUBJECT PARCEL referenced in this affidavit contains controlled substances, constituting evidence of violations of Title 21, United States Code, Sections 841 (a)(1), Possession with Intent to Distribute a Controlled Substance, and 843 (b), Unlawful Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance.

I respectfully request that a warrant be issued to search the subject parcel for evidence of the above violations.

Alan Book

Alan M. Book
United States Postal Inspector

Subscribed and sworn to before me on
This 22nd of August, 2022.

Maria S. Aguilera

Maria S. Aguilera
United States Magistrate Judge